

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re

BIG LOTS, INC., *et al.*,

Debtors.¹

Chapter 11

Case Nos. 24-11967 (JKS), *et seq.*

(Jointly Administered)

Hearing Date: May 13, 2025, 1:00 p.m.

Objections due by: May 5, 2025

NOTICE OF MOTION

TO: Parties listed on the Certificate of Service

Sharrell Smith, as parent and guardian of Heaven Smith, a minor, (“Movant”) has filed a Motion for Relief From The Automatic Stay (the “Motion”), which seeks the following relief: Relief from the automatic stay to prosecute litigation under applicable non-bankruptcy law against one or more of the above-captioned debtors for claims arising from injuries sustained while using a certain children’s chair purchased from one or more of the Debtors, including but not limited to pursuing available insurance proceeds.

HEARING ON THE MOTION WILL BE HELD ON MAY 13, 2025 AT 1:00 P.M. PREVAILING EASTERN TIME.

You are required to file a response, if any, on or before May 5, 2025 at 4:00 P.M. Prevailing Eastern Time. At the same time, you must also serve a copy of the response upon Movant’s attorneys:

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

Adam Hiller, Esquire
Hiller Law, LLC
300 Delaware Avenue, Suite 210, #227
Wilmington, Delaware 19801
(302) 442-7677 telephone
ahiller@adamhillerlaw.com

Kenneth J. Allen, Esquire
Otto J. Shragal, Esquire
Jeffrey L. Lund, Esquire
501 Allen Court, Suite 3000
Chesterton, Indiana 46304
(219) 465-6292 telephone
JLund@allen.law

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE,
THE RELIEF REQUESTED IN THE MOTION MAY BE GRANTED BY THE
COURT WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 14, 2025
Wilmington, Delaware

Respectfully submitted,

HILLER LAW, LLC

/s/ Adam Hiller

Adam Hiller (DE No. 4105)
300 Delaware Avenue, Suite 210, #227
Wilmington, Delaware 19801
(302) 442-7677 telephone
ahiller@adamhillerlaw.com

-and-

Kenneth J. Allen, Esquire
Otto J. Shragal, Esquire
Jeffrey L. Lund, Esquire
501 Allen Court, Suite 3000
Chesterton, Indiana 46304
(219) 465-6292 telephone
JLund@allen.law

Attorney for Movant